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Office of the City Manager
431-3000

November 1, 1991

Ms. Beth Brainard
Public Affairs Officer
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: The City of Arvada's Comments on the Proposed Interim Measure/Interim Remedial Action Decision Document (IM/IRA) for the Solar Evaporation Ponds Operable Unit No. 4

Dear Ms. Brainard:

The City of Arvada appreciates the opportunity to comment on the Proposed Interim Measure/Interim Remedial Action Decision Document (IM/IRA) for the Solar Evaporation Ponds Operable Unit No. 4 (OU4). Although Arvada is not affected by surface or groundwaters which could potentially be impacted by work at OU4, we are concerned that all remediation work performed at the facility be consistently carried out with an emphasis on protecting worker and public health as well as protecting the environment. Please find our comments below:

1. Page 2-25, Paragraph 3 - The assumption is made that there is no human receptor exposed to groundwater containing contaminants released from the Solar Evaporation Ponds (SEP's). However, we have concern that the contaminated ground and surface water may interface, thus contaminating surface water in North Walnut Creek. Rocky Flats should address this possible exposure pathway.
2. Page 2-26, Case A - The statement is presented that pathway A2 is considered negligible in part due to the very low contaminant concentration in the pond waters. This statement is erroneous and conflicts with the tone of the document. There is significant contamination in the waters, if there were not, there would not be the concern with discharging existing contaminated waters to North Walnut Creek.

ADMIN RECORD

14302

MHS
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A-OU04-000101

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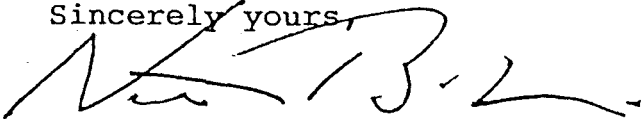
3. Page 2-28, Chemicals of Concern - Information is presented that states that a "review of available analytical data suggests that very few compounds, characteristic of the SEP's are notably toxic to humans." Rocky Flats should provide specific detail on the compounds and their concentrations both toxic and non-toxic to humans.
4. Page 2-29, Organics - Rocky Flats needs to provide information on the concentrations of organic compounds, which are referred to in the document as not relevant, rather than dismissing them from further evaluation.
5. Page 2-28 - Rocky Flats should address its air monitoring system in more detail e.g., number of HEPA air filters used, stack monitoring, pollutants monitored, etc.
6. Page 3-8, Distillate Disposition Plan - Many references are made to collecting samples and analyzing them to determine if pollutant levels are low enough to discharge distillate. We have the following questions about the sampling plan:
 - A. What are the distillate sampling parameters?
 - B. What are the action levels for release to the plant's raw water system?
 - C. What is the sample turn around time and is it short enough to guarantee enough distillate storage capacity prior to approved release of distillate?
7. Page 3-12, Alarms - What procedures are included in the inspection process and procedures to assure that the alarms will operate in an emergency situation?
8. Page 3, 3-13, Personnel Training - Will the evaporator manufacturer provide training on how to collect samples to assure distillate is suitable for use within the raw water system? Who provides training on sampling of concentrate?
9. Page 3-20, Assumptions, Uncertainties and Contingencies - The assumption is made that if a catastrophic failure of a tank occurs, the water will flow into North Walnut Creek and percolate back into the groundwater system. Allowing water to percolate to the groundwater is unacceptable. This procedure may contaminate ground water currently not contaminated. This will lead to more work in the future to decontaminate larger volumes of groundwater.

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10. Page 3-22, Table 3.2 - Are personnel costs contained in the Operation & Maintenance Cost for Pumping and Treatment Systems?
11. General Comment - Solid waste generation and disposal are concerns of both Rocky Flats and Arvada. To help reduce solid waste generation, we continue to encourage the Department of Energy and EG&G to double side copies of all information published for public review. Additionally, materials should be printed on recycled paper and efforts should be made to inform the public of these practices.

Thank you again for the opportunity to comment on the OU4 IM/IRA. If you have any questions, please do not hesitate to contact me at 431-3000.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'N. G. Berlin', with a stylized flourish at the end.

Neal G. Berlin
City Manager